

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE: INTERIOR MOLDED DOORS
INDIRECT PURCHASER ANTITRUST
LITIGATION

Lead Civil Action No. 3:18-cv-00850-JAG

**INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND SERVICE AWARDS
TO THE CLASS REPRESENTATIVES**

Pursuant to Federal Rules of Civil Procedure 23(h) and 54(d)(2), Settlement Class

Counsel respectfully move the Court for an Order: (1) awarding attorneys' fees in the amount of \$5,850,000, which is equal to 30% of the Settlement Fund¹, plus interest; (2) reimbursing expenses and costs incurred, totaling \$3,511,815.63; and (3) awarding each of the 28 class representatives \$1,000 for their contributions to the litigation, to be paid from the Settlement Fund. In support of this Motion, IPPs rely upon: (i) the Memorandum of Law in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Service Awards to the Class Representatives; and (ii) the Joint Declaration of William V. Reiss, Daniel C. Hedlund, and Steven N. Williams and exhibits thereto. IPPs submit this Motion in connection with Indirect Purchaser Plaintiffs' Motion for Final Approval of Settlement with Defendants.

¹ Unless otherwise set forth herein, all defined terms shall have the same meaning as set forth in the Settlement Agreement executed on September 4, 2020. (ECF No. 226-1).

Date: May 3, 2021

/s/

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Settlement Class Counsel for Indirect Purchaser Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of May 2021, a copy of the foregoing document was filed electronically on the Court's Electronic Case Filing (ECF) system. A Notice of Electronic Filing (NEF) will be sent by operation of the Court's ECF system to the filing party, the assigned Judge, and any registered user in the case as indicated on the NEF. To the best of my knowledge, there are no other attorneys or parties who require service by U.S. Mail.

s/Conrad Shumadine

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